

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

CASE NO.  
NOTICE OF REMOVAL  
[28 U.S.C. §§ 1441 and 1446]

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DEBORAH TRUDELL,	)
	)
Plaintiff,	)
v.	)
	)
HAMPDEN-WILBRAHAM REGIONAL	)
SCHOOL DISTRICT,	)
	)
Defendant.	)

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**NOTICE OF REMOVAL**

Pursuant to 28 U.S.C. §§ 1331, 1441 and 1446, the Defendant, Hampden-Wilbraham Regional School District (“Defendant”), by and through its undersigned counsel of record, respectfully submits this Notice of Removal of this action from the Trial Court of the Commonwealth of Massachusetts, Hampden County Superior Court, docket number 15 CV 0631, in which court the action was originally filed and is pending, to the United States District Court for the District of Massachusetts. In support of this Notice of Removal, the Defendant states the following:

1. On or about September 10, 2015, this action was filed by the Plaintiff, Deborah Trudell (“Plaintiff”), in the Trial Court of the Commonwealth of Massachusetts, Hampden County Superior Court, which is pending as Docket Number 15 CV 0631. The Defendant was served with the Complaint on December 8, 2015. A copy of the Complaint is attached as Exhibit A, the civil action cover sheet is attached as Exhibit B, and the summons is attached as Exhibit C.

2. The Plaintiff's Complaint alleges, in relevant part, that the Defendant, her former employer, discriminated against her on the basis of her disability, gender, age, and retaliation in violation of both state and federal antidiscrimination laws. Specifically, the Defendant claims violations of the Americans with Disabilities Act, 42 USC §§ 12101 et seq. (Counts VI, VII, and X), Title VII of the Civil Rights Act, 42 USC § 2000e (Count VIII), and the Age Discrimination in Employment Act, 29 USC §§621 et seq. (Count IX).

3. This District Court has original jurisdiction over this action pursuant to 28 U.S.C. § 1331. Pursuant to 28 U.S.C. § 1441(a), the Defendant is entitled to remove this action to this District Court.

4. Service was effected on the Defendant on December 8, 2015. Therefore, this Notice of Removal is being timely filed within (30) thirty days after receipt of the Complaint as required by 28 U.S.C. §1446(b). The attached Exhibits comprise all the pleadings or orders that have been served upon or otherwise received by the Defendant. To the best knowledge of the Defendant, no other parties have been named as defendants in the Complaint and no further proceedings have been held as of the date of this removal.

5. A copy of this Notice of Removal will be filed with the clerk of the Trial Court of the Commonwealth of Massachusetts, Hampden County Superior Court, and served upon the Plaintiff as required by 28 U.S.C. § 1446(d).

WHEREFORE, the Defendant respectfully requests that the above action now pending in the Trial Court of the Commonwealth of Massachusetts, Hampden County Superior Court, be removed to this United States District Court for the District of Massachusetts.

Respectfully submitted  
The Defendant,  
By their attorneys,

By: /s/ Sarah A. Catignani  
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Date: December 23, 2015

#### **CERTIFICATE OF SERVICE**

I, Sarah A. Catignani, hereby certify that this document filed through the CM/ECF system will be sent electronically to the registered participants as identified on the NEF (NEF) and paper and email copies will be sent to those indicated as non-registered participants on December 23, 2015, and by paper copy via overnight mail upon the Hampden County Superior Court, 50 State Street, Springfield, MA 01103 and counsel for the Plaintiff, Colleen A. Sullivan, Esq., Marien & Hodge, P.C., 121 State Street, #100, Springfield, MA 01103.

By: /s/ Sarah A. Catignani  
Sarah A. Catignani, Esquire